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**UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF CALIFORNIA**

THE RYAN FIRM
 A Professional Corporation

Source Capital Funding, Inc., a
 California Corporation,

Plaintiff,

vs.

Barrett Financial Group, L.L.C., an
 Arizona Limited Liability Company;
 Search Control, an Unknown Entity;
 and Does 1 through 10, inclusive,

Defendants.

CASE NO.: **'23CV0411 TWR WVG**

COMPLAINT FOR:

- (1) Submission of False DMCA Notices, 17 U.S.C. § 512(f)**
- (2) Tortious Interference with Prospective Economic Advantage**
- (3) Unfair Competition Under Bus. & Prof. Code § 17200**
- (4) Declaratory Relief**

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COMPLAINT

Plaintiff, Source Capital Funding, Inc., a California corporation, hereby sues Barrett Financial Group, L.L.C., an Arizona limited liability company, and Search Control, a business entity, form unknown, and Does 1 through 10, inclusive, and alleges as follows:

JURISDICTION AND VENUE

1. This is a civil action seeking declaratory relief and damages and arises under the copyright laws of the United States, 17 U.S.C. §§ 101 et seq. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331, 1332, and 2201, and the Declaratory Judgment Act, 28 U.S.C. § 2291.

2. This Court also has jurisdiction under the Digital Millennium Copyright Act (“DMCA”) pursuant to 17 U.S.C. § 512(g)(3)(D), which provides that “jurisdiction of Federal District Court for the judicial district in which the address of the [counter-notification subscriber] is located.”

3. This Court has supplemental jurisdiction of the state statutory and common law claims under 28 U.S.C. §§ 1338(b) and 1367(a). This complaint asserts claims for federal DMCA misrepresentation under 17 U.S.C. § 512(f), and for violation of California statutes (Business and Professions Code section 17200 et seq.), and claims under the common law of California.

4. This Court has personal jurisdiction and venue is proper in this Court pursuant to 28 U.S.C. § 1391 since Defendants are, upon information and belief doing business in, and substantially all conduct occurred, within this District, in addition to maintaining offices within this District.

THE PARTIES

5. Plaintiff, Source Capital Funding, Inc. (“Source Capital” or “Plaintiff”) is a California corporation with its principal place of business at 600 W. Broadway Suite 700, San Diego, California 92101.

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1 6. Plaintiff is informed and believes and thereon alleges that Defendant
2 Barrett Financial Group, L.L.C. ("Barrett") is an Arizona limited liability company with
3 its principal place of business at 2314 S. Val Vista Drive, Suite 201, Gilbert, Arizona
4 85295. On information and belief, Defendant maintains an office at 3207 Grey Hawk Ct
5 Suite 110, Carlsbad, CA 92010.

6 7. Plaintiff is informed and believes and thereon alleges that Defendant Search
7 Control is a business entity of unknown form with its principal place of business at 2390
8 E. Camelback Road #130, Phoenix, Arizona 85016. Search Control is an agent of Barrett
9 and operates in relation to the allegations of this lawsuit as such. Barrett retains the right
10 to control Search Control and direct its activities concerning the allegations of this
11 lawsuit. Further, Barrett and Search Control worked together to commit the wrongful acts
12 alleged herein. Barrett is identified as the "Principal" of Search Control as submitted in
13 the false DMCA notices that are the subject of this lawsuit.

14 8. Plaintiff is ignorant of the true names and capacities of the Defendants sued
15 herein as Does 1 through 10, inclusive, and therefore sues these Defendants by such
16 fictitious names. Plaintiff will amend this Complaint to include their true names and
17 capacities when ascertained.

18 9. Plaintiff is informed and believes and thereon alleges that each of the
19 fictitiously named Defendants is responsible in some manner for the occurrences herein
20 alleged.

21 10. Plaintiff is informed and believes and thereon alleges that each of the
22 Defendants named in this Complaint, including Does 1 through 10, inclusive, was the
23 agent, servant and employee of the remaining Defendants, and in doing the things herein
24 alleged, was acting within the course and scope of said agency and employment.

25 11. At all times herein mentioned, the unqualified use of the word
26 "Defendants" shall refer to each Defendant named in the caption of this action, including
27 Does 1 through 10, inclusive.

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SUMMARY OF THE CASE

12. This is a civil action seeking declaratory relief and damages regarding a series of false DMCA copyright infringement claims/notices that Defendants Barrett and Search Control made against Source Capital to Google LLC (“Google”). The false claims resulted in the improper “takedown” of Plaintiff’s most trafficked and visited webpages (<https://hardmoneyfirst.com/california-hard-money-lender/> and <https://hardmoneyfirst.com/arizona-hard-money-lender/> and caused irreparable harm to Plaintiff’s business and reputation. Specifically, Defendants knowingly misrepresented in their DMCA notices that Source Capital—a competitor in the private money lending industry—is infringing on certain images and text being used by Defendants.

13. The allegations of Defendants’ DMCA notices are provably false. Source Capital’s banner and text was created by Source Capital long before Barrett’s websites (<http://hardmoneylenderscalifornia.com/> and <http://hardmoneylendersarizona.com/>) ever used the banner and text. Source Capital was using its banner and text, which was the subject of the false DMCA notice, at times when Barrett’s websites did not even exist.

14. Defendants knew their DMCA notices were false. They nonetheless filed them against a competitor of Barrett’s in an ill-conceived and transparent campaign to obstruct Source Capital’s ability to market itself and obtain leads through online advertising, and thereby stifle competition.

15. In addition, Defendant Barrett has also engaged in a campaign to unfairly compete and mislead consumers about a number of other matters. Specifically, Barrett misrepresents that it is a member of the American Association of Private Lenders (“AAPL”). AAPL is a trade organization for private money lenders that requires its members to abide by a certain code of ethics as a requirement for membership. Barrett further misrepresents that it is a member of the Arizona Commercial Mortgage Lenders Association; this is also false. Barrett also falsely claims on its website that it is “accredited” by the Better Business Bureau. False advertising such as this is a violation of 12 C.F.R. §1014.3(n) concerning misrepresentations related to certain “associations”

1 that Barrett claims to have with other organizations. Barrett's acts in this regard are part
2 and parcel of its scheme to engage in unfair competition in the private money lending
3 marketplace, with Source Capital as its primary target.

4 STATEMENT OF FACTS

5 16. Source Capital is a California private money lender that has been in
6 business since 2007. Since its inception, Source Capital has funded over \$400 million in
7 commercial and residential loans secured by real estate. Source Capital is state and
8 federally licensed to do business and make loans in Arizona, California, Minnesota and
9 Texas, and Colorado.

10 17. Source Capital is informed and believes and thereon alleges that Barrett is a
11 mortgage broker headquartered in Arizona doing business in California and nationwide in
12 49 states, and a direct competitor to Source Capital in the hard money lending space.

13 18. Source Capital is informed and believes and thereon alleges that Search
14 Control is a digital marketing agency headquartered in Arizona and doing business in
15 Arizona and California, and was retained by Barrett during the time period relevant to
16 this Complaint. According to Search Control's website, it performs services related to
17 website design and development, search engine optimization ("SEO"), Pay-Per-Click
18 ("PPC") advertising, Google Business Profile Management, and content marketing.
19 Among other claims, Search Control states on its website: "**We are Google experts**, and
20 we have a tremendous amount of experience helping businesses of all sizes across
21 multiple industries. That way, we can make sure you are getting the most out of your
22 online presence. If you work with us, we can help you increase your rankings, drive
23 traffic, and put your Google Business Profile to work for you!" (Emphasis in original.)

24 19. Source Capital prides itself in its client service, particularly its ability to
25 quickly fund loans and make the hard money loan process efficient. As a result, it is an
26 A+ Accredited Business with the Better Business Bureau ("BBB") since 2010 and a 5-
27 Star rated Google, Yelp and Zillow lender.

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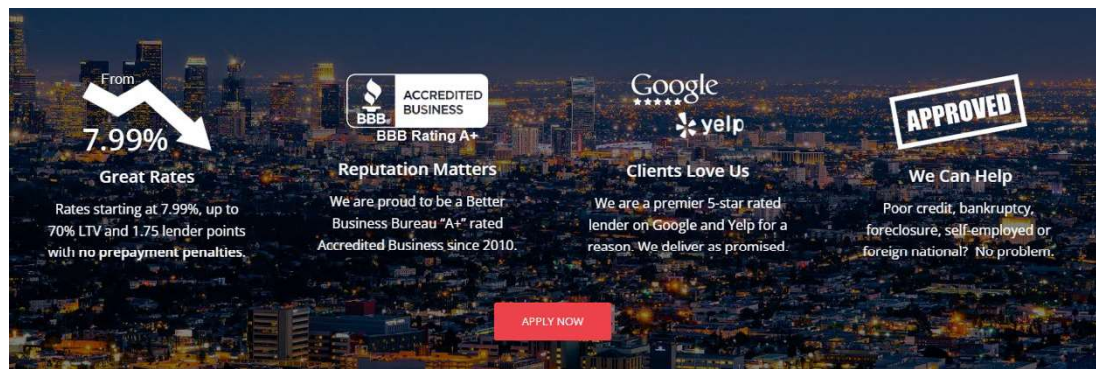
20. Like many businesses, Source Capital relies on internet marketing and web-based generated leads.

21. In addition, many businesses that advertise online also invest in search optimization to ensure that their websites are optimized for priority search terms that can result in higher rankings (meaning that these businesses' webpages/URLs appear higher in the search results), and increased traffic and conversions.

22. Source Capital's business is heavily driven by its investment in online advertising. As a result, advertising and search optimization is a major expense for Source Capital. In fact, Source Capital spent several hundred thousand dollars for banner ads and Google search optimization in the last quarter of 2022. The vast majority of Source Capital's leads and resulting business are generated via this online advertising.

Defendants' Fraudulent DMCA Notices

23. On or about October 31 and November 3, 2022, Defendants filed false DMCA notices with Google relating to Source Capital's use of a banner containing text and certain images on Source Capital's website, hardmoneyfirst.com. The banner that was being used by Source Capital is set forth below:



24. Defendants claimed in the DMCA notices that Source Capital's banner and text infringed on copyrighted material from Barrett's websites. Specifically, these websites are:

- hardmoneylenderscalifornia.com

- hardmoneylendersarizona.com

Notably, the names of Barrett’s websites are confusingly similar to that of the URLs used by Source Capital for years, including but not limited to hardmoneyfirst.com/california-hard-money-lender.com and hardmoneyfirst.com/arizona-hard-money-lender.com.

25. Defendants claimed in their DMCA notices to Google that “4 content boxes near top of their page, beginning with ‘Rates starting at 7.99%, up to 70% LTV . . .’ are copied identically from our website.” Furthermore, Defendants claimed in the DMCA notices that “[t]he original copyrighted text can be found on our website’s homepage . . .” Attached hereto as Exhibits 1-3 are copies of the respective public records of the DMCA notices.

26. Source Capital, however, originally created the banner at issue and has been using it since at least 2015. This was well before Barrett and/or Search Control started using the banner. As further evidence that that the banner was copied from Source Capital, the banner on Barrett’s websites indicate that Barrett is an accredited member of the Better Business Bureau (“BBB”), which Source Capital is, and Barrett is not.

27. In fact, Source Capital’s investigation revealed that there is no instance of the banner on Barrett’s websites as of 2018. Additionally, Barrett’s website, hardmoneylenderscalifornia.com did not even exist in 2016. Therefore, it is undisputable that Source Capital originally used the banner and text to which Barrett falsely claims it owns a copyright. Accordingly, Defendants’ assertions made in the DMCA notice are knowingly false and merely part of a plan concocted by Defendants to damage and compromise Source Capital’s ability to market through the use of its website and digital traffic.

28. As a direct response to Defendants’ false and misrepresented DMCA claims, Google delisted and/or subsequently deindexed several of Source Capital’s webpages, in addition to Google compromising Source Capital’s ability to market and drive traffic to its other webpages. As a result of Defendants’ false and misrepresented

1 claims, and Google's resultant delisting and subsequent deindexing of Source Capital's
2 webpages, Source Capital suffered irreparable harm to its reputation and further damage
3 to its business, including but not limited to the deindexing of its websites, as identified
4 herein.

5 29. Based on the foregoing, Defendants' fraudulent DMCA notices caused
6 immense damage to Source Capital's business and affected Source Capital's ability to
7 market online and generate leads. Likewise, Defendants' false DMCA notices were
8 specifically designed to harm and damage Barrett's competitor, Source Capital, during
9 one of the busiest times of the year for Source Capital. Moreover, DMCA filings are
10 public record. DMCA filings are public record and anyone doing their due diligence on
11 Source Capital could easily make a decision from Defendants' false filing to not do
12 business with Source based on this fact alone.

13 30. There is no question that Defendants acted intentionally and with malice in
14 filing their false DMCA notices. Defendants specifically targeted selective pages on
15 Source Capital's websites that have historically been the most visited and highly
16 trafficked. Defendants undoubtedly sought to have those pages taken down in order to
17 inflict maximum damage and illegally divert as much potential business from Source
18 Capital as possible.

19 31. Source Capital has suffered irreparable harm and damage as a result of
20 Defendants' malicious and outrageous acts. Due to Defendants' false DMCA notices and
21 Google's resultant removal of Source Capital's webpages, Source Capital experienced a
22 drastic decline in website traffic and leads during its busiest times of year, which
23 translates into lost revenue and actual damages caused by Defendants.

24 32. Additionally, Source Capital spends a significant amount of money with its
25 digital marketing agency in managing its online advertising, including its Pay-per-click
26 ("PPC") and SEO campaigns. Indeed, it took Source Capital years and hundreds of
27 thousands of dollars to get to the top of Google's rankings, and now it is forced to start all
28 over again. It could possibly take years and another significant influx of capital for

1 Source Capital to reestablish its ranking. As a small three-person firm, Source does not
2 have the resources to accomplish this like a larger firm like Barrett would. Additionally,
3 Source Capital's relationship with Google has been tarnished and compromised.

4 33. Defendants are responsible for Source Capital's damages including, but not
5 limited to, costs incurred with Google and fees paid to Source Capital's third party
6 internet marketing firm. The DMCA prohibits the filing of false DMCA claims and
7 provides for damages, attorneys fees and costs to an aggrieved party. Specifically,
8 Section 512(f) of the DMCA provides in pertinent part that "[a]ny person who knowingly
9 materially misrepresents under this section – (1) that material or activity is infringing . . .
10 shall be liable for any damages, including costs and attorneys' fees, incurred by the
11 alleged infringer, by any copyright owner or copyright owner's authorized licensee, or by
12 a service provider, who is injured by such misrepresentation, as the result of the service
13 provider relying upon such misrepresentation in removing or disabling access to the
14 material or activity claimed to be infringing"

15 **Defendant Barrett's Unfair Business Practice of False Advertising**

16 34. Separately, Defendant Barrett has been engaging in false and deceptive
17 advertising further aimed at stifling competition. Barrett misrepresents that it is a member
18 of the American Association of Private Lenders ("AAPL") and the Arizona Commercial
19 Mortgage Lenders Association ("ACMLA"). This is false, as Barrett is not a member of
20 either of these organizations. In addition, Barrett also falsely claims that it is an
21 "Accredited Business" with the BBB, which is also false. These false representations
22 about the various associations are a violation of 12 C.F.R. §1014.3(n) and in every State
23 Barrett does business in. Indeed, false advertising in the mortgage lending business is
24 regulated heavily in each State.

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FIRST CLAIM**(Submission of False DMCA Notices, 17 U.S.C. § 512(f))****(Against All Defendants)**

35. Plaintiff incorporates the allegations set forth in the preceding paragraphs as if fully set forth herein.

36. On October 31, 2023, and November 3, 2023, Defendants filed a series of false DMCA notices that resulted in the improper “takedown” and/or deindexing of Plaintiff’s webpages and caused irreparable harm to Plaintiff’s business and reputation. Specifically, Defendants knowingly misrepresented in their DMCA notices that Source Capital is infringing on certain images and text being used by Defendant.

37. Defendants knew their DMCA notices were false. They nonetheless filed them in bad faith against a competitor in an ill-conceived and transparent campaign to obstruct Source Capital’s ability to market itself and obtain leads through online advertising, and thereby stifle competition.

38. Defendants’ filing of false DMCA notices violated § 512(f) of the DMCA, which provides in pertinent part: “[a]ny person who knowingly materially misrepresents under this section – (1) that material or activity is infringing . . . shall be liable for any damages, including costs and attorneys’ fees, incurred by the alleged infringer, by any copyright owner or copyright owner’s authorized licensee, or by a service provider, who is injured by such misrepresentation, as the result of the service provider relying upon such misrepresentation in removing or disabling access to the material or activity claimed to be infringing”

39. As a direct response to Defendants’ false and misrepresented DMCA claims, Google delisted and/or subsequently deindexed several of Source Capital’s webpages from Google, in addition to Google compromising Source Capital’s ability to market and drive traffic to its other webpages. As a result, Source Capital suffered irreparable harm to its reputation and further damage to its business.

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40. As a result, Defendants' actions have proximately caused damage to Source Capital, including but not limited to lost profits, goodwill, monetary damage, damage to reputation, lost marketing expenses, in addition to attorney fees and punitive damages for the malicious conduct set forth herein.

SECOND CLAIM

41. Plaintiff incorporates the allegations set forth in the preceding paragraphs as if fully set forth herein.

42. Defendant Barrett has been engaging in false and deceptive advertising further aimed at stifling competition. Barrett misrepresents that it is a member of AAPL and the Arizona Commercial Mortgage Lenders Association. In addition, Barrett also claims that it is an “Accredited Business” with the Better Business Bureau, which is also false. These false representations about the various associations is a violation of 12 C.F.R. §1014.3(n).

43. Source Capital is informed and believes, and thereon alleges, that Barrett, in addition to creating confusingly similarly named websites as Source Capital's and purloining Source Capital's banner, has falsely claimed to be affiliated with the above organizations because Source Capital is an Accredited Business with the BBB.

44. Barrett knew or should have known of Plaintiff's business and economic relations with existing clients in the private money lending sector as the parties are competitors. Barrett is willfully committing intentional, malicious and wrongful acts to disrupt these potential users during the busiest quarter of the year.

45. Barrett has committed and continues to commit such intentional, willful and malicious acts with the design of disrupting Plaintiff's business relations and reaping future economic benefit that would flow to Plaintiff, and such acts will cause damage to Plaintiff, including but not limited to lost profits and goodwill, monetary damage and

1 damage to reputation. The acts complained of herein also entitle Source Capital to an
2 award of punitive damages.

3 **THIRD CLAIM**

4 **(Unfair Competition – California Business and Professions Code § 17200 et seq.)**
5 **(Against Defendants Barrett and Does 1-10)**

6 46. Plaintiff incorporates the allegations set forth in the preceding paragraphs
7 as if fully set forth herein.

8 47. Defendant Barrett has been engaging in false and deceptive advertising
9 further aimed at stifling competition. Barrett misrepresents that it is a member of AAPL
10 and the Arizona Commercial Mortgage Lenders Association. In addition, Barrett also
11 claims that it is an “Accredited Business” with the Better Business Bureau, which is also
12 false. These false representations about the various associations is a violation of 12
13 C.F.R. §1014.3(n).

14 48. Source Capital is informed and believes, and thereon alleges, that Barrett,
15 in addition to creating confusingly similarly named websites as Source Capital’s and
16 purloining Source Capital’s banner, has falsely claimed to be affiliated with the above
17 organizations because Source Capital is an Accredited Business with the BBB.

18 49. As a proximate result of the acts of Barrett as alleged herein, Plaintiff has
19 suffered and will continue to suffer economic injury.

20 50. Plaintiff has no adequate remedy at law for the acts of unfair competition as
21 alleged herein. Unless the Court grants relief and enjoins Barrett from its false
22 advertising, as set forth herein, Plaintiff, in addition to similarly situated companies and
23 consumers will continue to suffer harm.

24 51. Barrett’s intentional and deceptive acts as alleged herein constitute acts of
25 unfair competition in violation of the laws of the State of California and the laws and
26 regulations of the United States.

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FOURTH CAUSE OF ACTION

(Declaratory Judgment – Declaratory Judgment Act, 28 U.S.C. § 2201)

(Against Defendants Barrett and Does 1-10)

52. Plaintiff incorporates the allegations set forth in the preceding paragraphs as if fully set forth herein.

53. Plaintiff seeks a declaratory judgment pursuant to 28 U.S.C. § 2201 and Federal Rule of Civil Procedure, Rule 57 for the purpose of determining and adjudicating questions of actual and substantial controversy between parties having adverse legal interests of sufficient immediacy and reality to warrant the issuance of declaratory relief.

54. There is a real and actual controversy between Source Capital Funding, Inc. and Barrett Financial Group, L.L.C. as to whether Plaintiff infringes on any alleged copyright belonging to Defendant.

55. Specifically, Plaintiff claims that its banner ad does not infringe on any exclusive rights secured by the Copyright Act or any other state or federal law, including those laws prohibiting direct, contributory or vicarious infringement. Plaintiff's banner ads are protected by the First Amendment to the United States Constitution and the judicial decisions construing such laws, doctrines, and provisions, and the Fair Use Doctrine, codified at 17 U.S.C. § 107. Further, Plaintiff created the works in question.

56. Plaintiff is therefore entitled to a declaration and judgment that its banner ad does not infringe on any alleged copyright of Defendant Barrett, or any other exclusive rights that Defendant might assert under state or federal law.

PRAYER FOR RELIEF

WHEREFORE, Source Capital respectfully prays that the Court order the following relief:

1. A declaratory judgment as set forth herein;
2. An award of compensatory, consequential, statutory, and punitive damages in an amount to be determined at trial;


By: TIMOTHY M. RYAN
ANDREW J. MASE
MICHAEL W. STOLTZMAN JR.
CHRIS S. PACETTI
Attorneys for Plaintiff Source Capital
Funding, Inc.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, demand is hereby made for trial by jury on all issues triable to a jury.

DATED: March 6, 2023

THE RYAN FIRM
A Professional Corporation

By: 
TIMOTHY M. RYAN
ANDREW J. MASE
MICHAEL W. STOLTZMAN JR.
CHRIS S. PACETTI
Attorneys for Plaintiff Source Capital
Funding, Inc.

THE RYAN FIRM
A Professional Corporation

EXHIBIT 1

EXHIBIT 1

[Search](#)[Topics](#)[Research and Media Mentions](#)[About](#)[Go](#)

DMCA (Copyright) Complaint to Google

SENDER

Search Control
on behalf of **Hard Money**
Lenders California
[Private]
US

Sent on November 03, 2022

COUNTRY: US us

RECIPIENT

Google LLC
[Private]
Mountain View, CA, 94043, US

SUBMITTER

Google LLC

OTHER ENTITIES: **PRINCIPAL**

Re: Unknown

NOTICE TYPE: DMCA

Copyright claim 1

KIND OF WORK: Unspecified

DESCRIPTION Copyrighted text from our website (hardmoneylenderscalifornia.com) is being infringed on the URL in question (hardmoneyfirst.com/caifornia-hard-money-lender/). The 4 content boxes near the top of their page, beginning with "Rates starting at 7.99%, up to 70% LTV..." are copied identically from our website. The original copyrighted text can be found on our website's homepage under the "Why Hard Money Lenders Arizona?" section.

ORIGINAL URLS: 01. https://hardmoneylenderscalifornia.com/

**ALLEGEDLY
INFRINGING
URLS:**

01. <https://hardmoneyfirst.com/california-hard-money-lender/>

JURISDICTIONS

US

TOPICS

DMCA Notices, Copyright

TAGS

 2017
Lumen

[Spring '22 Research Sprint](#)

[Blog Archive](#)

[Legal](#)

[Licenses](#)

[Privacy](#)

[Researchers](#)

[Sign In](#)

EXHIBIT 2

EXHIBIT 2

[Search](#)[Topics](#)[Research and Media Mentions](#)[About](#)[Go](#)

DMCA (Copyright) Complaint to Google

SENDER

Search Control
on behalf of **Hard Money**
Lenders Arizona
[Private]
US

Sent on October 31, 2022

COUNTRY: US us

RECIPIENT

Google LLC
[Private]
Mountain View, CA, 94043, US

SUBMITTER

Google LLC

OTHER ENTITIES: **PRINCIPAL**

Re: Unknown

NOTICE TYPE: DMCA

Copyright claim 1

KIND OF WORK: Unspecified

DESCRIPTION Copyrighted text from our website (hardmoneylendersarizona.com) is being infringed on the URL in question (hardmoneyfirst.com/arizona-hard-money-lender/). The 4 content boxes near the top of their page, beginning with "Rates starting at 7.99%, up to 70% LTV..." are copied identically from our website. The original copyrighted can be found on our website's homepage under the "Why Hard Money Lenders Arizona?" section.

ORIGINAL URLS: 01. www.hardmoneylendersarizona.com - 1 URL

**ALLEGEDLY
INFRINGING
URLS:**

01. hardmoneyfirst.com - 1 URL

[Click here](#) to request access and see full URLs.**JURISDICTIONS**

US

TOPICS

DMCA Notices, Copyright

TAGS 2017
Lumen

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Blog Archive

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Privacy

Researchers

Sign In

EXHIBIT 3

EXHIBIT 3

[Search](#)[Topics](#)[Research and Media Mentions](#)[About](#)[Go](#)

DMCA (Copyright) Complaint to Google

SENDER

Search Control
on behalf of **Hard Money**
Lenders Arizona
[Private]
US

Sent on November 03, 2022

COUNTRY: US us

RECIPIENT

Google LLC
[Private]
Mountain View, CA, 94043, US

SUBMITTER

Google LLC

OTHER ENTITIES: **PRINCIPAL**

Re: Unknown

NOTICE TYPE: DMCA

Copyright claim 1

KIND OF WORK: Unspecified

DESCRIPTION Copyrighted text from our website (hardmoneylendersarizona.com) is being infringed on the URL in question (hardmoneyfirst.com). The 4 content boxes near the top of their page, beginning with "Rates starting at 7.99%, up to 70% LTV..." are copied identically from our website. The original copyrighted text can be found on our website's homepage under the "Why Hard Money Lenders Arizona?" section.

ORIGINAL URLS: 01. hardmoneylendersarizona.com - 1 URL

**ALLEGEDLY
INFRINGING
URLS:**

01. hardmoneyfirst.com - 1 URL

[Click here](#) to request access and see full URLs.

JURISDICTIONS US

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